

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

2019 MAY -7 PM 12: 13

**U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN**

)
UDEME EDOHO-EKET)
Plaintiff,)
v.)
Case No.
Nordstrom, Inc.,) Damages: \$2,000,000,000
Defendants.)

COMPLAINT

1. Plaintiff is currently employed full-time by Defendants, Nordstrom, Inc., as of January 22, 2019, as a Counter Manager, though on Monday, May 6th, Plaintiff received a call from HR Director, Helen Kim, and was told that Plaintiff's employment is to be put on paid suspension while Defendants investigate Plaintiff's social media, thus, admitting to cyberstalking Plaintiff in protection of the company "Code of Conduct".
2. The claim is to the possibly irreparable harm Plaintiff has endured; since being employed at Nordstrom, Inc., Plaintiff has endured dehumanization, degradation, demoralization, insults both direct and indirect, harassment, coercion, exploitation, intimidation, and bullying while being employed at Nordstrom, Inc. from various staff, including immediate supervisors / department managers. The mistreatment is daily, though Plaintiff has consistently outperformed the expectations of the counter volume goals by month and each week at least one of her four lines of inventory are ranked best in the region. Plaintiff meets deadlines, coaches, employees, completes paperwork, and situates the visual schematic according to policy. Though Plaintiff has urgent issues affecting her personal life, they are not at issue while Plaintiff is at work, as the intent to separate work and life - deemed important in Defendants "Company Policy" - is beneficial to Plaintiff. As of April 2019, Plaintiff has sought immediate mental health treatment and is in the care of a world-renowned psychiatrist.

3. Defendants are actively involved in fraud. As of April, 2019, after months of employment, Plaintiff has been unable to adequately save properly to support her disproportionately high living expenses in correlation to Plaintiff's job skills in marketable value and actual paid earnings, due to Defendant's business model of having two food service establishments in their mall location, wherein Plaintiff is employed; Plaintiff is coerced to spend earnings from Nordstrom, Inc. at Nordstrom, Inc. to support her livelihood - to buy food - utilizing company discounts, which exploits Plaintiffs human rights and fundamental needs to have nourishment during a working day in a highly active, ambiguous and dynamic environment.
4. Defendants' decision to outright embezzle money from employees by exploiting their basic human need for food is padding the company valuation as a publicly traded corporate entity and is disingenuous in trade reporting, as Nordstrom, Inc. is misrepresenting its actual earnings and corporate valuation to shareholders. Defendants are likely siphoning money from employees rather than capitalizing ethically in order to keep pace with growing e-commerce markets. However, the competitive landscape does not call for capitalists to grow by any means, rather, to adhere to ethical business practices that does not harm its employees and that does not violate the United States Constitution, is not criminal in intent nor criminal in its methodology. Embezzlement¹ - also classified as larceny - is the separation of property by manipulating from the property owner to the perpetrator. That Plaintiff has no room to be herself, to utilize social media outside of working hours without violating the Terms of Use of the platform itself, and is subject to cyberstalking and intimidation by staff in Defendants corporate office is revealing of its values and what is at the crux of its methods - to make marketable dehumanization to cater to a class of elite shoppers who continually perpetuate racism by means of intolerance and as perpetrators of hate crimes. Nordstrom, Inc. is a fraud.
5. Case law and code violations are as follows:
 1. 18 U.S. Code § 1038. False information and hoaxes²
 - (a) Criminal Violation.

2. SECURITIES AND EXCHANGE COMMISSION, Plaintiff, - against -
BERNARD L. MADOFF, BERNARD L .MADOFF INVESTMENT SECURITIES LLC,
Defendants.³

¹ LII Staff. "Embezzlement." *Legal Information Institute*, Legal Information Institute, 7 Apr. 2015, www.law.cornell.edu/wex/embezzlement.

² "18 U.S. Code § 1038 - False Information and Hoaxes." *Legal Information Institute*, Legal Information Institute, www.law.cornell.edu/uscode/text/18/1038.

³ <https://www.sec.gov/litigation/complaints/2008/comp-madoff121108.pdf>

DAMAGES

Plaintiff has endured gross abuses that have affected her mental health and seeks compensatory and punitive damages - relief in the amount of \$2,000,000,000. Plaintiff also wants all meals and beverages served at cost at Nordstrom, Inc. to be complimentary at Nordstrom, Inc. for all employees.

I hereby certify under penalty of perjury that the above is true to the best of my information, knowledge, and belief.

Signed this 7th day of May 2019

/s/ Udeeme Edoho-Eket 
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